

EXHIBIT E

CJ

From: CJ
Sent: Monday, November 13, 2017 2:27 PM
To: SchonMJ@State.gov
Cc: Bob Birach
Subject: Ms. Huda Ashwal

Dear Special Agent Schon,

This email is to follow up on our conversation this afternoon regarding Ms. Huda Ashwal.

As I explained, Ms. Ashwal has hired us to represent her in relation to the denial of her passport renewal.

I understood from our conversation that Ms. Ashwal is currently the subject of an ongoing criminal investigation involving human smuggling and potential naturalization fraud which you called "extremely complicated" and believe it will be a "lengthy process" to sort out. Ms. Ashwal has been cooperative and your office has been candid with her. You stated several times during our conversation that you do not believe Ms. Ashwal to have committed any crime, but that you "do not have proof" that she did not. You also stated that as her husband went on the record to accuse her of smuggling, you would like Ms. Ashwal to go "on the record" and provide her side of the story. You suggested that at this point, going on the record with such a statement is the only way to refute her husband's allegations. The U.S. Attorney's Office and your superiors have the final authority as to whether or not any criminal charges will be brought against Ms. Ashwal or how or when the investigation is otherwise resolved. When I inquired what the legal basis was for withholding Ms. Ashwal's passport, you again reiterated that she is the subject of an ongoing criminal investigation.

I understood from our conversation that while you would like Ms. Ashwal to provide a sworn statement, receiving her passport will simply depend on the course of your investigation and there is nothing Ms. Ashwal can or should do to receive her passport other than to wait on your office concluding its investigation against her.

If any of the above facts are NOT correct, or you have additional information to provide please feel free to clarify the above statements to ensure we are all on the same page.

As you are aware, any pending criminal investigation for naturalization fraud has no effect on the fact that Ms. Ashwal remains a U.S. citizen until her citizenship is revoked after appropriate proceedings. The right to travel has been held to be a fundamental constitutional right. As of this moment, we see no legal basis for the ongoing denial of a passport renewal to our client and unless there is additional information to justify the ongoing denial of a passport to her we will be taking appropriate actions to make sure Ms. Ashwal receives the documentation to which she is legally entitled.

Please feel free to contact our office if you have any questions or clarifications in regards the above. I do appreciate your candor and willingness to speak today.

Thank you very much,

C.J. CANNON
Associate Attorney

BIRACH LAW, P.C.
26211 Central Park Blvd., Suite 209
Southfield, MI 48076
(313) 964-1234

CJ

From: Schon, Michael J <SchonMJ@state.gov>
Sent: Thursday, November 16, 2017 7:10 PM
To: CJ
Cc: Bob Birach
Subject: RE: Ms. Huda Ashwal

Good evening,

As this is an ongoing criminal investigation, I am not at liberty to discuss the details of the case. There are some details from our conversation with you and your client that are missing. Regardless, it may be in your client's best interest to cooperate with the investigation. As previously mentioned, we would like to schedule a formal interview with your client.

Please let me know how you and your client wish to proceed.

Thank you for your time,

Michael Schon
-Special Agent-
United States Department of State
DSS | New York Field Office

Official
UNCLASSIFIED

CJ

From: CJ
Sent: Friday, November 17, 2017 9:37 AM
To: Schon, Michael J
Cc: Bob Birach
Subject: RE: Ms. Huda Ashwal

With all due respect, Officer, Ms. Ashwal has been very cooperative with the investigation. As far as providing a sworn statement, Ms. Ashwal has made clear (and I have reiterated) that she is choosing not to do so at this time. This is a decision which she is fully at liberty to make.

As far as "missing details", I would appreciate you correcting the record as the intention of my email to you was to make sure there is a record which can be corrected. It does little good to suggest "details are missing" but not to provide the corrected details to us so that we are all on same page.

Ms. Ashwal has hired our office to represent her in regards to the issue of obtaining her renewal passport so she can travel. We are not at this point advising her with regards to any criminal matters. You've provided me with a *reason* as to why her passport is being withheld, but have yet to cite any *legal authority* for the withholding. As such, we maintain the position that this is an unlawful denial of Ms. Ashwal's constitutionally-guaranteed right to travel.

If, on the other hand, your office has no authority over the passport matter, please provide us with the correct office or party to discuss the issue with. Our sole interest is in guaranteeing Ms. Ashwal her rights as a citizen, which as I stated she remains entitled to until she has been found guilty of a crime after fair trial, or until her citizenship has been stripped in accordance with due process of law.

Thank you very much,

C.J. CANNON
Associate Attorney

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